

KOSHIBA AGENA & KUBOTA

JAMES E. T. KOSHIBA 768-0
CHARLES A. PRICE 5098-0
2600 Pauahi Tower
1003 Bishop Street
Honolulu, Hawaii 96813
Telephone No.: 523-3900
Facsimile No.: 526-9829
Email: jkoshiba@koshibalaw.com
cprice@koshibalaw.com

Attorneys for Defendant
UNITED PUBLIC WORKERS,
AFSCME, LOCAL 646, AFL-CIO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

JEANNE ENDO,)	CIVIL NO. CV03-00563 LEK
)	
Plaintiff,)	DEFENDANT UNITED PUBLIC
)	WORKERS' DEPOSITION
vs.)	COUNTER DESIGNATIONS AND
)	OBJECTIONS; CERTIFICATE OF
UNITED PUBLIC WORKERS,)	SERVICE
AFSCME LOCAL 646, AFL-CIO,)	
)	
Defendant,)	
)	
vs.)	TRIAL DATE: May 13, 2008
)	
GARY W. RODRIGUES,)	
)	
Third-Party Defendant.)	
)	
)	

DEFENDANT UNITED PUBLIC WORKERS' DEPOSITION COUNTER
DESIGNATIONS AND OBJECTIONS

Defendant United Public Workers, AFSCME Local 646, AFL-CIO
("UPW") counter designates the following excerpts from the oral deposition of Gary
W. Rodrigues, taken on July 7, 2004:

Page ("p.") 4, line ("l.") to p. 5, l. 17.

P. 6, l. 9 to p. 9, l. 4.

P. 10, l. 10 to p. 10, l. 15.

P. 11, l. 18 to p. 12, l. 21.

P. 16, l. 3 to p. 17, l. 3.

P. 26, l. 17 to p. 27, l. 8.

P. 27, l. 18 to p. 28, l. 22.

P. 30, l. 6 to p. 35, l. 6.

P. 36, l. 1 to p. 37, l. 16.

P. 37, l. 24 to p. 39, l. 24.

P. 40, l. 20 to p. 41, l. 2.

P. 57, l. 24 to p. 58, l. 18.

P. 80, l. 9 to p. 80, l. 12.

P. 82, l. 15 to p. 82, l. 19.

UPW objects to the following deposition excerpts designated by Plaintiff:

P. 63, l. 15 to p. 65, l. 22; p. 67, l. 18 to 22 - Evidence of Carroll's previous sex harassment complaint and settlement is irrelevant and inadmissible character evidence (FRE Rules, 401, 402, 403, and 404, (subject of motions in limine)).

P. 69, l. 4 to p. 70, l. 10 - Rodrigues' testimony regarding alleged indemnity and alleged minutes confirming indemnity is not based on personal knowledge (FRE Rule 602), is hearsay (FRE Rules 801, 802), and violates the best evidence rule (FRE Rule 1001).

DATED: Honolulu, Hawaii, April 29, 2008.

/s/ Charles A. Price

JAMES E. T. KOSHIBA

CHARLES A. PRICE

Attorneys for Defendant

UNITED PUBLIC WORKERS,

AFSCME, LOCAL 646, AFL-CIO